

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

**UNITED GILSONITE LABORATORIES,
A PENNSYLVANIA CORPORATION,**

DEBTOR.

Civil Action No. 3:14-2045 (MEM)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

**UNITED GILSONITE LABORATORIES,
A PENNSYLVANIA CORPORATION,¹**

DEBTOR.

Chapter 11

Case No. 5:11-bk-02032-RNO

**AGENDA OF MATTERS
SCHEDULED FOR HEARING ON DECEMBER 8, 2014 AT 10:00 A.M.**

1. 11/20/14 *Debtors Motion Pursuant to Sections 105(a) and 363 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 9019(a) for an Order Authorizing and Approving the Debtors Entry Into a Settlement Agreement with Hartford Insurance Company and Authorizing Sale of Policy Interests Free and Clear of Liens, Claims, Interests and Other Encumbrances* including Exhibit A Settlement Agreement; Notice; Proposed Order [D.I. 2110] and Amended Notice [D.I. 2112].

Related Documents:

- A. 11/20/14 *Order Granting Debtor's Motion for an Order Shortening Time* [D.I. 2107].
- B. 11/25/14 *Certificate of Service of Eamon Mason re Motion to Approve Settlement with Hartford Insurance Company, Amended Notice of Motion to Approve Settlement with Hartford Insurance Company* [D.I. 2120].

Responses: None.

¹ The last four digits of the Debtor's federal tax identification number are 7530.

Status: Certificate of No Objection filed December 2, 2014 [D.I. No. 2136].

2. 11/20/14 *Debtors Motion Pursuant to Bankruptcy Rule 9019(a) for an Order Authorizing and Approving the Debtors Entry Into a Settlement Agreement with Pennsylvania Manufacturers Association Insurance Company* including Exhibit A Settlement Agreement; Notice; and Proposed Order [D.I. 2111].

Related Documents:

- A. 11/20/14 *Order Granting Debtor's Motion for an Order Shortening Time* [D.I. 2109].
- B. 11/25/14 *Certificate of Service of Eamon Mason re Motion to Approve Settlement with Pennsylvania Manufacturers' Association Insurance Company* [D.I. 2121].

Responses: None

Status: Certificate of No Objection filed December 2, 2014 [D.I. No. 2137].

3. 11/24/14 *Debtors Motion Pursuant to Bankruptcy Rule 9019(a) for an Order Authorizing and Approving the Debtors Entry Into a Settlement Agreement with Hudson Insurance Company* including Exhibit A Settlement Agreement; Notice; and Proposed Order [D.I. 2118].

Related Documents:

- A. 11/24/14 *Order Granting Debtor's Motion for an Order Shortening Time* [D.I. 2117].
- B. 12/4/14 Amended (Signed) Exhibit A Settlement Agreement [D.I. 2157].
- C. 11/25/14 *Certificate of Service of Ira Nikelsberg re Motion to Approve Settlement with Hudson Insurance Company* [D.I. 2122]

Responses: 12/4/14.

Status: Certificate of No Objection filed December 5, 2014 [D.I. 2161].

4. 11/26/14 *Debtors Motion Pursuant to Bankruptcy Rule 9019(a) for an Order Authorizing and Approving the Debtors Entry Into a Settlement Agreement with Fireman's Fund Insurance Company* including Exhibit A Settlement Agreement; Notice; and Proposed Order [D.I. 2125].

Related Documents:

- A. 11/26/14 *Order Granting Debtor's Motion for an Order Shortening Time* [D.I. 2124].
- B. 12/2/14 Amended (Signed) Exhibit A Settlement Agreement [D.I. 2145].
- C. 12/2/14 *Certificate of Service of Ira Nikelsberg re Motion to Approve Fireman's Fund Settlement, Motion to Approve OneBeacon Settlement and Supplemental Plan Notice* [D.I. 2146]
- D. 12/4/14 *Certificate of Service of Eamon Mason re Amended Motion to Approve OneBeacon Settlement, Declaration of Donald R. Mancuso, Memorandum of Law in Support of Final Order and Confirmation of the Modified First Amended Plan, and [Proposed] Findings of Fact, Conclusions of Law, and Order Approving Exit Facility and the Modified First Amended Plan* [2159]

Responses: Due 12/5/14.

Status: Certificate of No Objection to be provided on December 8, 2014.

- 5. 11/26/14 *Debtors Motion Pursuant to Bankruptcy Rule 9019(a) for an Order Authorizing and Approving the Debtors Entry Into a Settlement Agreement with OneBeacon American Insurance Company* including Exhibit A Settlement Agreement; Notice; Proposed Order [D.I. 2128]; Amended Motion 12/2/14 [D.I. 2138].

Related Documents:

- A. 11/26/14 *Order Granting Debtor's Motion for an Order Shortening Time* [D.I. 2127].
- B. 12/2/14 Amended (Signed) Exhibit A Settlement Agreement [D.I. 2139].
- C. 12/2/14 *Certificate of Service of Ira Nikelsberg re Motion to Approve Fireman's Fund Settlement, Motion to Approve OneBeacon Settlement and Supplemental Plan Notice* [D.I. 2146]

Responses: Due 12/5/14.

Status: Certificate of No Objection to be provided on December 8, 2014.

- 6. 12/3/14 *Debtors Motion Pursuant to Bankruptcy Rule 9019(a) for an Order Authorizing and Approving the Debtors Entry Into a Settlement Agreement with Travelers Casualty & Surety Company f/k/a Aetna Casualty & Surety Company* including Exhibit A Settlement Agreement; Notice; and Proposed Order [D.I. 2150].

Related Documents:

- A. 12/3/14 *Order Granting Debtor's Motion for an Order Shortening Time* [D.I. 2149].
- B. 12/4/14 Amended (Signed) Exhibit A Settlement Agreement [D.I. 2155].
- C. 12/4/14 *Certificate of Service of Eamon Mason re Motion to Approve Travelers Settlement and Supplemental Plan Notice* [D.I. 2160]

Responses: Due on 12/8/14 before or at the hearing.

Status: Matter going forward.

JOINT CONFIRMATION HEARING

- 7. 9/30/14 *Modified First Amended Plan of Reorganization of United Gilsonite Laboratories Under Chapter 11 of the Bankruptcy Code* with Exhibits A-J [D.I. 2013].

Related Documents:

- A. 9/30/14 *Order (A) Approving Disclosure Statement with Respect to Debtor's Modified First Amended Plan of Reorganization ("The Plan"); (B) Establishing Procedures for Solicitation and Tabulation of Voting on the Plan and Approving Forms of Ballots (C) Scheduling a Hearing on Confirmation of The Plan; and (D) Approving the Form and Manner of Notice of Said Confirmation Hearing* [D.I. 2014].
- B. 10/21/14 *Motion for Partial Withdrawal of the Reference* [D.I. 2059] [USDC D.I. 1].
- C. 10/22/14 *Exhibit A to Debtor's Motion to Partially Withdraw the Reference* [D.I. 2060] [USDC D.I. 1-1].
- D. 11/14/14 *Order (Partially Withdrawing the Reference)* [USDC D.I. 2]
- E. 11/14/14 *Notice of Filing of Plan Documents* including Plan Exhibits A-J and Exit Facility Attachments A-G [D.I. 2098].
- F. 11/26/14 *Supplemental Notice of Filing of Plan Documents* including Plan Exhibit B [D.I. 2129].
- G. 12/1/14 *Declaration of Craig E. Johnson of GCG, Inc. Certifying the Methodology for the Tabulation of Votes on and Results of Voting with*

Respect to the Debtor's Modified First Amended Plan of Reorganization [D.I. 2134].

- H. 12/2/14 *Declaration of James L. Patton, Jr. in Support of Confirmation of the Modified First Amended Plan of Reorganization of United Gilsonite Laboratories Under Chapter 11 of the Bankruptcy Code* [D.I. 2140].
- I. 12/2-3/14 *Declaration of Donald R. Mancuso in Support of Confirmation of the Modified First Amended Plan of Reorganization of United Gilsonite Laboratories*[D.I. 2142]; [D.I. 2152 (adds signature)].
- J. 12/2/14 *Debtor's Memorandum of Law in Support of (A) Entry of a Final Order Authorizing United Gilsonite Laboratories ("Debtor") to (I) Obtain Exit Financing, (II) Enter Into Revolving Credit, Term Loan and Security Agreement, and Furnish Related Indemnities, and (B) Confirmation of the Debtor's Modified First Amended Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [D.I. 2143].
- K. 12/2/14 *Proposed Findings of Fact, Conclusions of Law, and Order Approving Exit Facility and Confirming the Modified First Amended Plan of Reorganization of United Gilsonite Laboratories Under Chapter 11 of the Bankruptcy Code* [D.I. 2144].
- L. 12/3/14 *Supplemental Notice of Filing of Plan Documents* including Amended Plan Exhibit B [D.I. 2154].
- M. 12/5/14 *Declaration of Brian T. Fitzpatrick in Support of Confirmation of the Modified First Amended Plan of Reorganization of United Gilsonite Laboratories Under Chapter 11 of the Bankruptcy Code* [D.I. 2166].
- N. 12/5/14 *Notice of Selection of Proposed Trustee of the United Gilsonite Laboratories Asbestos Personal Injury Trust* [2167]

Responses:

- A. 11/21/14 *Objection of TIG Insurance Company to the Modified First Amended Plan of United Gilsonite Laboratories Under Chapter 11 of the Bankruptcy Code* [D.I. 2113].
- B. 12/3/14 *Stipulation Resolving Objection of TIG Insurance Company* [D.I. 2147].
- C. 12/3/14 *Stipulation Regarding Non-Asbestos Policies Issued to United Gilsonite Laboratories by Gulf Underwriters Insurance Company and Travelers Casualty and Surety Company f/k/a the Aetna Casualty and Surety Company* (resolving informal objection) [D.I. 2153].

Status: Matter going forward.

8. Proposed District Court *Order Under 11 U.S.C. § 524(G)(3)(A) Affirming Bankruptcy Court's Confirmation of Chapter 11 Reorganization Plan and Issuance of Channeling Injunction*. [Submitted to Chambers in Advance of Hearing].

Related Documents: N/A.

Responses: N/A.

Status: Matter going forward upon oral motion.

Dated: December 5, 2014

GIBBONS P.C.

By: /s/ Mark B. Conlan

Mark B. Conlan (PA No. 86559)
Karen A. Giannelli (admitted *pro hac vice*)
Frank J. Vecchione (admitted *pro hac vice*)
One Gateway Center
Newark, NJ 07102
Telephone: (973) 596-4500
Facsimile: (973) 596-0545
E-mail: mconlan@gibbonslaw.com
kgiannelli@gibbonslaw.com
fvecchione@gibbonslaw.com

- and -

Natasha M. Songonuga (admitted *pro hac vice*)
1000 N. West Street, Suite 1200
Wilmington, DE 19801-1058
Telephone: (302) 295-4875
Facsimile: (302) 295-4876
E-mail: nsongonuga@gibbonslaw.com

Attorneys for the Debtor and Debtor-in-Possession